

JUDGE JONES

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

CECIL SUWAL,  
a/k/a "Katie,"  
a/k/a "Kate,"

Defendant.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED JUN 03 2008 INFORMATION
--

: 08 Cr. \_\_\_\_\_

: **08 CRIM**

:

- - - - -x

COUNT ONE

The United States Attorney charges:

1. From in or about December 2004, through and including on or about March 6, 2008, in the Southern District of New York and elsewhere, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1952(a)(3), 2421, and 2422(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, would and did use and cause to be used facilities in interstate commerce, to wit, cellular telephones and e-mail, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of



applicable State law, and thereafter did perform and attempt to perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

3. It was further a part and an object of the conspiracy that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did transport individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

4. It was further a part and an object of the conspiracy that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, unlawfully, willfully and knowingly would and did persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others,



were committed in the Southern District of New York and elsewhere:

a. From in or about December 2004 through in or about March 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, controlled a website located at URL [www.emperorsclubvip.com](http://www.emperorsclubvip.com) that included photographs of prostitutes' bodies, with their heads hidden, along with hourly rates for different categories of prostitutes;

b. From in or about December 2004 through in or about at least January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, received applications from women seeking to work as prostitutes with her prostitution business (hereinafter, the "Emperors Club") at various e-mail accounts;

c. On or about January 9, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, spoke over the telephone about offering the Emperors Club's clients the opportunity to exercise a "buyout clause," which would permit clients to purchase direct access to one of the Emperors Club's prostitutes without having to contact the agency;

d. On or about January 15, 2008, a co-conspirator not named as a defendant herein ("CC-1") spoke with a client of the Emperors Club over the telephone about arranging for a prostitute to come to his room at a hotel in New York, New York;



e. On or about January 15, 2008, a prostitute working with the Emperors Club went to a client's hotel in New York, New York;

f. On or about January 18, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to a potential prostitute asking her to send photographs of herself to SUWAL;

g. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, received an e-mail from a potential prostitute declining to work for the Emperors Club in part because her friend had to have sex with a client "twice in an hour";

h. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to CC-1 attaching a list of the aliases used by more than 50 prostitutes working with the Emperors Club in, among other places, New York, New York; Los Angeles, California; Miami, Florida; London, England; and Paris, France;

i. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to a prostitute working with the Emperors Club and asked if she would be available on February 11, 2008, in Europe for an extended prostitution date with a client to cost \$25,000 or more.



j. On or about January 28, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and two co-conspirators not named as defendants herein ("CC-2," and "CC-3," respectively) met in the vicinity of Grand Central Terminal in New York, New York;

k. On or about January 30, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, spoke over the telephone with CC-1 and CC-2 regarding problems with one of the Emperors Club's prostitutes who they believed might be abusing drugs;

l. On or about January 31, 2008, CC-3 sent CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, a text message over the telephone informing SUWAL that CC-3 had scheduled a date for an Emperors Club client with an Emperors Club prostitute in Europe;

m. On or about February 7, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, spoke over the telephone with CC-1 about the fact that an Emperors Club client had complained that one of the prostitutes was "more sex than sexy";

n. On or about February 11, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, communicated via text message with CC-1 about the fact that the three-day rates for two of the Emperors Club prostitutes were \$50,000 and \$35,000, respectively;



o. On or about February 12, 2008, CC-1 spoke with an Emperors Club client over the telephone about arranging for a prostitute to travel from New York to Washington, D.C.; and

p. On or about February 13, 2008, an Emperors Club prostitute traveled from New York, New York, to a hotel in Washington, D.C.

(Title 18, United States Code, Section 371.)

**COUNT TWO**

The United States Attorney further charges:

6. From in or about December 2004, through and including on or about March 6, 2008, in the Southern District of New York and elsewhere, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1956.

7. It was a part and an object of the conspiracy that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct such financial



transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the use of facilities in interstate commerce with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, a business involving prostitution offenses in violation of applicable State law, in violation of Title 18, United States Code, Section 1952(a)(3); interstate transportation of individuals to engage in prostitution, in violation of Title 18, United States Code, Section 2421; and persuasion of individuals to travel in interstate and foreign commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a), (a) with the intent to promote the carrying on of specified unlawful activity, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

#### Overt Acts

8. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:



a. On or about December 10, 2004, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened a bank account in the name of "QAT Consulting Group, Inc.";

b. On or about November 30, 2006, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened a bank account in the name of "QAT International, Inc.";

c. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, and others, received more than \$1 million in proceeds from the Emperors Club prostitution business in bank accounts in the names of "QAT Consulting Group, Inc.," and "QAT International, Inc.";

d. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote more than \$100,000 in checks to cash from bank accounts in the names of "QAT Consulting Group, Inc.," and "QAT International, Inc.";

e. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote more than \$39,000 in checks to Protech Consultants, a company whose bank account was controlled by CC-2; and

f. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the



defendant, wrote checks and sent wire transfers totaling more than \$400,000 from bank accounts in the name of "QAT Consulting Group, Inc.," and "QAT International, Inc.," to more than 50 prostitutes working with the Emperors Club in the United States and Europe.


(Title 18, United States Code, Sections 1956(h).)



**FORFEITURE ALLEGATION**

9. As a result of committing the money laundering offense alleged in Count Two of this Information, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense alleged in this Information and all property traceable to such property.

(Title 18, United States Code, Section 982.)

  
MICHAEL J. GARCIA  
United States Attorney



Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

CECIL SUWAL,  
a/k/a "Katie,"  
a/k/a "Kate,"

Defendant.

---

INFORMATION

08 Cr.

(18 U.S.C. §§ 371 and 1956(h).)

---

MICHAEL J. GARCIA  
United States Attorney.

---

June 3, 2008

Information filed. Warner filed.  
Def. Cecil Suwal present w/ atty Albert Ebanks.  
AUSA's Daniel Stein and Rita Glavin present.  
Def pleads guilty as charged in Information  
(Counts 1 + 2). PSI ordered. Sentence  
date 9/12/08 at 3:30p.  
Bail continued.

Jones, J.